

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE COBALT INTERNATIONAL
ENERGY, INC. SECURITIES LITIGATION

Lead Case No. 4:14-cv-3428 (NFA)

**PLAINTIFFS' MOTION FOR CLASS CERTIFICATION AND APPOINTMENT
OF CLASS REPRESENTATIVES AND CLASS COUNSEL**

PLEASE TAKE NOTICE that Lead Plaintiffs GAMCO Global Gold, Natural Resources & Income Trust and GAMCO Natural Resources, Gold & Income Trust, through their undersigned counsel, together with additional plaintiffs (i) St. Lucie County Fire District Firefighters' Pension Trust Fund, (ii) Fire and Police Retiree Health Care Fund, San Antonio, (iii) Sjunde AP-Fonden, and (iv) Universal Investment Gesellschaft m.b.H. (collectively with the GAMCO Funds, "Plaintiffs") hereby respectfully move, pursuant to Federal Rules of Civil Procedure 23(a), (b)(3), and (g), for an Order:

1. Certifying a Class of investors, defined as:

All persons and entities who purchased or otherwise acquired Cobalt securities between March 1, 2011 and November 3, 2014, inclusive and were damaged thereby. Included within the Class are all persons and entities who purchased shares of Cobalt common stock on the open market and/or pursuant or traceable to the registered public offerings on or about (i) February 23, 2012; (ii) January 16, 2013; and (iii) May 8, 2013. Also included within the Class are all persons and entities who purchased Cobalt convertible senior notes on the open market and/or pursuant or traceable to registered public offerings on or about (i) December 12, 2012; and (ii) May 8, 2014.

Excluded from the Class are Defendants, the officers and directors of the Defendants during the Class Period (the "Excluded Officers and Directors"); members of the immediate families of the individual Defendants and of the Excluded Officers and Directors; any entity in which any Defendant, any Excluded Officer or Director, or any of their respective immediate family members has, and/or had during

the Class Period, a controlling interest; Defendants' liability insurance carriers; any affiliates, parents, or subsidiaries of the corporate Defendants; all corporate Defendants' plans that are covered by ERISA; and the legal representatives, heirs, agents, affiliates, successors-in-interest or assigns of any excluded person or entity, in their respective capacity as such.

2. Appointing Plaintiffs as Class Representatives; and
3. Appointing Co-Lead Counsel Entwistle & Cappucci LLP and Bernstein

Litowitz Berger & Grossmann LLP as Class Counsel.

WHEREFORE, for the reasons set forth in the accompanying (i) Memorandum of Law in Support of Plaintiffs' Motion, (ii) Declaration of Andrew J. Entwistle with accompanying exhibits, (iii) pleadings and records on file in this case, and (iv) such matters and argument that the Court may consider in hearing this Motion, this Court should enter the [Proposed] Order Granting Plaintiffs' Motion for Class Certification, and Appointment of Class Representatives and Class Counsel.

Dated: November 2, 2016

Respectfully submitted,

**BERNSTEIN LITOWITZ
BERGER & GROSSMANN LLP**

ENTWISTLE & CAPPUCCI LLP

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/s/ Andrew J. Entwistle

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Counsel for Plaintiff Sjunde AP-Fonden

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

/s/ Andrew J. Entwistle
Andrew J. Entwistle